

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

CNS INTERNATIONAL	)	
MINISTRIES, INC.,	)	
	)	
Plaintiff,	)	
v.	)	Case No. 2:21-cv-00065
	)	
JENNIFER TIDBALL,	)	
	)	
Defendant.	)	

**JOINT PROPOSED SCHEDULING PLAN**

The parties, by and through counsel, respectfully submit this Joint Proposed Scheduling Plan in compliance with this Court's November 15, 2021, Order:

1. The parties agree that the Track Assignment in this case, Track II, is appropriate.
2. The parties propose that all motions for joining parties or amending pleadings be filed no later than February 16, 2022.
3. Discovery Plan. The parties jointly propose the following discovery plan:
  - a. The parties will make their initial disclosures pursuant to Rule 26(a)(1) on or before January 6, 2021.
  - b. The parties intend to submit a proposed Rule 502(d) order, specifically, the Model Order adopted by the United States District Court for the Western District of Missouri.

- c. The parties do not need to conduct discovery in phases.
  - d. The parties do not anticipate using expert witnesses for this case.
  - e. The presumptive limits of 25 interrogatories per party and ten depositions per side provided in Rules 33 and 30 are appropriate and should apply in this case.
  - f. The parties will not request the physical or mental examination of any party pursuant to Rule 35.
  - g. Any discovery motions shall be filed on or before May 11, 2022.
  - h. All discovery shall be completed no later than June 1, 2022.
4. Dispositive motions, including motions for summary judgment, shall be filed no later than July 1, 2022.
5. At this time the parties do not believe that referral of this case to mediation or early neutral evaluation would be useful.
6. The earliest date by which this case should reasonably be expected to be ready for trial is March 20, 2023. At this time the parties estimate the length of trial to be three days.

By agreeing to this schedule, the Plaintiff does not waive any right it may have to emergency or preliminary injunctive relief.

Respectfully submitted,

**OTTSEN, LEGGAT AND BELZ, L.C.**

/s/ Timothy Belz

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